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**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

In Re: Frank Joseph Keough Maria Concetta Keough Debtors(s)	 Chapter 13 Case Number: 19-13280-elf
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**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Village Capital & Investment, LLC has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362(d) and §1301 in order to proceed with its rights under non-bankruptcy law with regard to the Property, located at 2018 Pierce Drive, Whitehall, PA 18052.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before February 27, 2020, you or your attorney must do all of the following:

(a) file an answer explaining your position with the Clerk's Office located at:

Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

In Philadelphia:

900 Market Street, Suite 400
Philadelphia, PA 19107-4299

In Reading:

400 Washington Street
The Madison Building, Suite 300
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

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and to the Trustee:

Scott F. Waterman
Ch. 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in this motion.
3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on March 12, 2020 at 11:00 A.M. in Courtroom #1, United States Bankruptcy Court, The Madison Building, Reading, PA 19601.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

STERN & EISENBERG, PC

By: /s/ Daniel P. Jones, Esq.
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Date: January 31, 2020